

October 23, 2014

Office of the General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

MUR 6896

RECEIVED
FEDERAL ELECTION
COMMISSION

2014 OCT 29 PM 12:40

OFFICE OF GENERAL
COUNSEL

Re: Margie Wakefield and the Margie Wakefield for Kansas Committee.

To Whom It May Concern:

Pursuant to 2 U.S.C. §437(g)(a)(1) and 11 C.F.R. §111.4 (2008), please accept this letter as a Complaint against Margie Wakefield ("Wakefield") and the Margie Wakefield for Kansas Committee ("Committee") for operating in violation of the Federal Election Campaign Act of 1971, as amended (the "Act"), and Federal Election Commission ("FEC" or "Commission") regulations, and more specifically, for the advertising disclaimer requirements set forth in 52 U.S.C. 30120 and 11 CFR part 110.

I. Facts

The Margie Wakefield for Kansas Committee is the authorized principal campaign committee for Margie Wakefield, a candidate for the U.S. House of Representatives seat representing Kansas's 2nd Congressional District. The Campaign has produced and distributed yard signs currently on display all over the district. See Attachment. The yard signs feature the text "Margie Wakefield for Congress," but unlawfully fails to include any disclaimer or other information disclosing the yard signs' source of payment.

II. Relevant Law

Any public communication made by a political committee must display a disclaimer. 11 CFR 110.11(a)(1). A public communication is defined, in part, as any "general public political advertising," which includes yard signs. 11 CFR 100.26.

If the communication is paid for and authorized by a candidate, an authorized committee of a candidate, or an agent of either, the disclaimer must clearly state that the communication has been paid for by the authorized political committee. 11 CFR 110.11(b)(1). All disclaimers must be "clear and conspicuous". 11 CFR 110.11(c)(1). In addition, disclaimers on printed materials must be of sufficient type size to be clearly readable, set aside in a box, and printed with a reasonable degree of color contrast between the background and the printed statement. 11 CFR 110.11(c)(2).

III. Legal Analysis

Simply put, Wakefield and the Committee failed to include on their yard signs a clear statement indicating that the communication has been paid for by Margie Wakefield for Kansas. As a result of the absence of a "clearly conspicuous" written disclaimer on the yard signs, Wakefield and the

Committee violated federal law and failed to satisfy the requirements of 11 CFR § 110.11(b)-(c). Accordingly, the yard signs are undoubtedly impermissible and are in clear violation of both Federal law and FEC Regulations.

IV. Conclusion

Upon information and belief, and based upon the facts relayed herein, Margie Wakefield and the Margie Wakefield for Kansas Committee have violated the Federal Election Campaign Act of 1971, as amended, and Federal Election Commission Regulations. Accordingly, we respectfully request that the Commission conduct an immediate investigation into the violations outlined above and impose the maximum penalty under law.

The foregoing is correct and accurate to the best of my knowledge, information and belief.

Respectfully submitted,

NAME

Cheryl Reynolds

Sworn to and subscribed before me this 23 day of October, 2014.

Bernadette M. Smith
Notary Public

My Commission Expires: 4.20.17



House: Race Ratings

Car Comparison | U.S. News Best Cars

14978370525.pdf

Image# 14978370857

**SCHEDULE B (FEC Form 3)
ITEMIZED DISBURSEMENTS**Use separate schedule(s)
for each category of the
Detailed Summary PageFOR LINE NUMBER:
(check only one)

PAGE 333 OF 381

<input checked="" type="checkbox"/> 17	<input type="checkbox"/> 18	<input type="checkbox"/> 19a	<input type="checkbox"/> 19b
<input type="checkbox"/> 20a	<input type="checkbox"/> 20b	<input type="checkbox"/> 20c	<input type="checkbox"/> 21

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Margie Wakefield for Kansas

Full Name (Last, First, Middle Initial)

A. Econ-O-Print

Mailing Address PO Box 4041

City

Topeka

State

KS

Zip Code

66604-0041

Purpose of Disbursement
Campaign Lawn Signs

008

Category/
Type

Candidate Name

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For: 2014

☒ Primary ☐ General
☐ Other (specify)

State:

District:

Date of Disbursement

08	04	2014
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Amount of Each Disbursement this Period

6747.34

Transaction ID : VN7RF9SRER0

B. First Bank Merchant Services

Mailing Address 5565 Glenridge Connector NE

City

Atlanta

State

GA

Zip Code

30342-1651

Purpose of Disbursement
Credit Card Processing Fee

001

Category/
Type

Candidate Name

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For: 2014

☒ Primary ☐ General
☐ Other (specify)

State:

District:

Date of Disbursement

08	04	2014
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Amount of Each Disbursement this Period

458.40

Transaction ID : VN7RF9SQCC3

C. First Bank Merchant Services

Mailing Address 5565 Glenridge Connector NE

City

Atlanta

State

GA

Zip Code

30342-1651

Purpose of Disbursement
Credit Card Processing Fee

001

Category/
Type

Candidate Name

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For: 2014

☒ Primary ☐ General
☐ Other (specify)

State:

District:

Date of Disbursement

08	04	2014
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Amount of Each Disbursement this Period

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Transaction ID : VN7RF9SQCD1

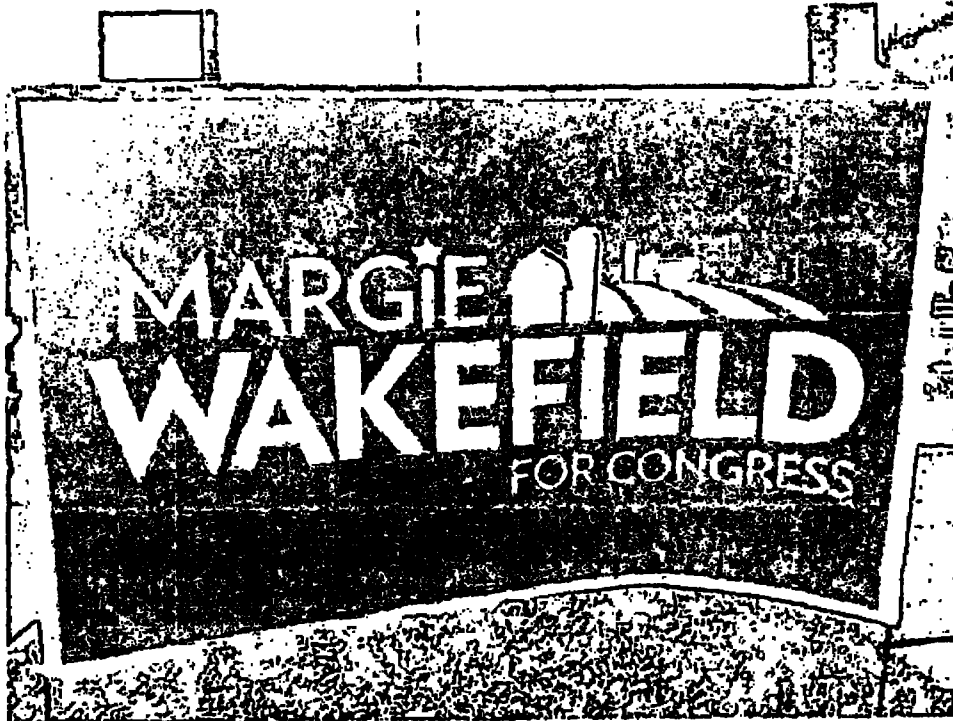
SUBTOTAL of Disbursements This Page (optional).....

7415.81

TOTAL This Period (last page this line number only).....

The logo for Margie Wakefield for Congress. It features the name "MARGIE WAKEFIELD" in a large, bold, sans-serif font. A small star is positioned above the letter "I" in "MARGIE". To the right of the name is a stylized graphic of a farm with a barn and silos, and a road leading towards them. Below the main name, the words "FOR CONGRESS" are written in a smaller, all-caps, sans-serif font.The logo for Margie Wakefield for Congress. It features the name "MARGIE WAKEFIELD" in a large, bold, sans-serif font. A small star is positioned above the letter 'I' in "MARGIE". To the right of the name is a silhouette of a city skyline with a prominent building. Below the main name, the words "FOR CONGRESS" are written in a smaller, all-caps, sans-serif font.

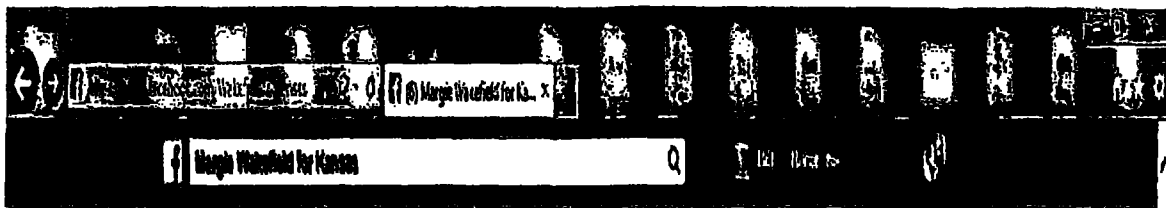
ATTACHMENT



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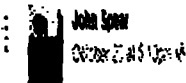
150443851187



Margie Wakefield for Kansas

Margie Wakefield for Kansas · 1,234 likes · 567 comments

Create Page



Get mail from Justice today with your positions as a
negative. Thank... See More

Like · Comment



LIKED BY THIS PAGE



Paul Davis

Like



KDP Second Congress...

Like



Tom Wolf

Like

Expenses Privacy Terms Content Advertising
Help · Facebook © 2014

YARD SIGNS ARE ON THE WAY!

We're getting closer and closer to Election Day, and yard signs will be on our doorstep at HQ soon!

We've already had a lot of requests for them out on the campaign trail, but I want to make sure we have yard signs in each and every corner of the district.

You've all done so well sharing post-after-post with your friends, and we've built so much momentum because of the conversation we're having here on Facebook. Now, I need you to share my name with your neighbors. Help me continue to spread my message throughout the entire district.

You can request a yard sign at wakefieldforkansas.com/learn-wakefield.

Then, share this post, and let your friends know how they can request a yard sign and show their support for my campaign.

Repost

2014

2013

Sponsored by



Special offer from AT&T
Upgrade TV + Internet \$55/mo
for 12 mos with 1 yr term
PLUS \$150 Reward Card see
details



Go Chat (40)



WAKEFIELD

FOR CONGRESS

ENTER ADDRESS

SIGN UP

HOME

ABOUT MARGIE

VIDEOS

TEAM WAKEFIELD

YOUR THOUGHTS

DONATE

TEAM WAKEFIELD

This campaign relies on reaching one person to person, neighbor to neighbor, and Kansan to Kansan.

Will you sign up to volunteer and take the first steps to take back our district, state, and nation today?

WILL YOU VOLUNTEER?

- ☐ I will call voters.
- ☐ I will host a house party
- ☐ I will stuff envelopes
- ☐ I will walk neighborhoods and knock on voters' doors
- ☐ I want to be an intern
- ☐ I want to be a precinct captain
- ☐ I want to request a yard sign